

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII

324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

Other:

November 9, 1979

Mr. Godfrey J. Moll Vice President and General Manager Nutrition and Chemical Division P.O. Box 1246 S.S.S. Springfield, Missouri 65805

Dear Mr. Moll:

As you know, from conversations with Mr. Robert Morby, Chief, Hazardous Materials Branch and visits by the Environmental Protection Agency (EPA) personnel with Syntex personnel during the week of October 15, 1979, the Regional Office is currently investigating allegations received from a caller who requested not to be identified concerning disposal of North Eastern Pharmaceutical and Chemical Company (NEPACCO), Inc., wastes.

The allegations under investigation are that waste materials from NEPACCO's hexachlorophene production operation were disposed of on the Syntex facility at Verona, Missouri, two farms in the area and a municipal landfill which has since been closed. It was further alleged that the waste material contained chemicals from the NEPACCO process and that persons handling these wastes have experienced health problems.

The preliminary nature of our investigation precludes my providing any more details as to either the allegations or our findings to date. Because of the existing knowledge and past environmental and public health problems concerning NEPACCO wastes, we are giving this matter our highest priority. We would very much appreciate any information you might have on the following:

- 1. Any records, past agreements or contracts your firm may presently have concerning NEPACCO.
- 2. Information on the NEPACCO hexachlorophene process(es), raw materials, and any analysis of such chemicals, as well as any information on pilot studies concerning the hexachlorophene process.
- 3. The nature of the wastes which resulted from this production process, including any chemical analyses of the wastes, guantities generated per batch operation, and unplanned events resulting in process materials or product becoming wastes.

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- 4. The location(s) of disposal sites used by NEPACCO.
- 5. The method of treatment and disposal of process wastes including the fate of equipment and materials treating these wastes.
- 6. The names of persons who might have knowledge of NEPACCO activities including where wastes were disposed.
- 7. All available information at the disposal trenches located on your property, including:
 - a. The number of trenches
 - b. Dimensions of each trench (length, width, depth)
 - c. The time period or periods over which each received wastes
 - d. The chemical characteristic (major constituents, liquid, solid, etc.) in each trench
 - e. Who dug each trench and any engineering work information prior to construction
 - f. The location of any monitoring wellor devices, dates of sampling, methods and results of analysis.

We appreciate receiving your invitation to meet with us on November 14, 1979. We will plan to arrive at your office in Springfield, Missouri at 9:00 a.m. on the above date.

If you have questions, please contact Mr. Chet McLaughlin at 816-374-3307.

Sincerely yours,

Director, Air and Hazardous Materials Division